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September 16, 1991

Courtney McEnery  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Jacob K. Javits Building  
New York, NY 10278

Re: Comment to EPA's  
Remedial Investigation, Feasibility Study and  
Proposed Remediation for the  
Rockaway Borough Well Field Site  
Thiokol Corporation

Dear Ms. McEnery:

On behalf of Thiokol Corporation (Thiokol), we are transmitting comments prepared by Thiokol's consultants, Conestoga-Rovers and Associates (CRA).

Initially, we object to the timeframe within which EPA has allowed Thiokol to review the Remedial Investigation (RI), Feasibility Study (FS) and Proposed Plan, especially since we did not receive the RI until August 27, and the FS on August 29, even though EPA has had over four years to conduct the investigations.

EPA's proposed remedy is fundamentally flawed and should not proceed. To proceed with EPA's proposed remedy at this time would be in our judgment inconsistent with the National Contingency Plan, arbitrary, capricious and not otherwise in accordance with the law. The enclosed comments spell out the specific reasons for this statement which include, among others:

1. EPA's Proposed Plan results from an incomplete Remedial Investigation. Thus, the proposed remedy, at least regarding the PCE plume contamination, is premature.

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2. EPA's proposed remedy is not cost-effective. CRA on behalf of Thiokol Corporation is presenting an alternative remedy which meets or exceeds EPA's Proposed Plan and is millions of dollars cheaper both now and in the future.

For these reasons, and for the reasons discussed in more detail in the enclosed comments, we believe it is imperative that EPA's proposed remedy not proceed as outlined and that an alternate approach be considered and chosen at this time.

We stand ready to meet with representatives of the EPA to discuss these comments and other matters related to the remediation of the Rockaway Borough Well Field.

Respectfully submitted,



EDWARD C. LAIRD

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Enclosures

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